

Before the Federal Communications Commission  
Washington, D.C. 20554

12 April 2004

Research In Motion Limited  
295 Phillip Street  
Waterloo, Ontario N2L 3W8

Re: WT Docket No. 01-309/RM-8658

Reply Comments

Dear Sir or Madam:

Research In Motion Limited ("RIM") is pleased to note that many organizations have supported our Petition for Reconsideration, in which we requested clarification that the *de minimis* exception of the new rules on Hearing Aid-compatible Mobile Handsets will apply on a per-air interface basis.

RIM notes specifically the supportive comments provided by Self Help for Hard of Hearing People (SHHH), Telecommunications for the Deaf Inc. (TDI) and the National Association for the Deaf (NAD) in recent comments to the Commission. However, RIM respectfully disagrees with the proposed interpretation advanced by these organizations: that when a manufacturer has only one handset in any particular interface, that manufacturer would be subject to the HAC rule. We believe that this interpretation could actually set a higher standard of compliance for smaller manufacturers than for larger ones, clearly not the intent of the Commission in establishing the exception in the first place.

RIM reiterates its commitment to the goals of access to telecommunications services to individuals with hearing disabilities. At the same time, RIM reiterates its request that the Commission reconsider and clarify that the *de minimis* exception be applied on an air interface by air interface basis.

Thank you for your consideration of these comments.

Sincerely,

Robert E. Crow  
Director, Government and University Relations  
Research In Motion Limited